## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 1 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00001	6/17/2016	Arruda, Andrew	Errico, Chris	Hamilton, Thomas	Email chain reflecting information gathered or prepared at the direction of counsel regarding employment legal matters	AC
P00002	6/28/2016	Arruda, Andrew	Hamilton, Thomas		Email chain seeking legal advice regarding completion of documents	AC
P00003	6/28/2016	Arruda, Andrew	Errico, Chris		Email chain seeking legal advice regarding employee matters	AC
P00004	7/11/2016	Hamilton, Thomas	Van Der Heijden, Tomas*		Email with attachment(s) seeking legal advice regarding negotiation questions	AC
P00005	5/10/2017	Van Der Heijden, Tomas*	Hamilton, Thomas		Email providing legal advice regarding contract negotiations	AC
P00006	5/31/2017	Hamilton, Thomas	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding training data	AC
P00007	6/2/2017	Van Der Heijden, Tomas*	Parkinson, Fergus		Email chain with attachment(s) providing legal advice regarding contract research	AC
P00008	6/6/2017	Parkinson, Fergus	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding ownership rights in Cobra and LegalEase data	AC
P00009	6/6/2017	Van Der Heijden, Tomas*	Parkinson, Fergus		Email chain providing legal advice regarding LegalEase payments	AC
P00010	6/12/2017	Hamilton, Thomas	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding LegalEase training data	AC
P00011	6/12/2017	Van Der Heijden, Tomas*	Hamilton, Thomas		Correspondence draft seeking legal advice regarding LegalEase memo stack	AC
P00012	6/12/2017	Van Der Heijden, Tomas*	Hamilton, Thomas		Email chain providing legal advice regarding contract negotiations	AC
P00013	6/27/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh		Email providing legal advice regarding internal counsel task	AC
P00014	7/7/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Hamilton, Thomas Ovbiagele, Jimoh	Email chain providing legal advice regarding negotiation advice	AC
P00015	7/7/2017	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas Ovbiagele, Jimoh		Email providing legal advice regarding LegalEase memo project	AC
P00016	7/7/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Hamilton, Thomas Oybiagele, Jimoh	Email chain seeking legal advice regarding memo project	AC
P00017	7/10/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Arruda, Andrew Hamilton, Thomas	Email chain providing legal advice regarding memo project	AC
P00018	7/11/2017	Hamilton, Thomas	Ovbiagele, Jimoh	Arruda, Andrew Van Der Heiiden, Tomas*	Email chain seeking legal advice regarding ROSS-LegalEase bulk memo	AC
P00019	8/1/2017	Asana	Ovbiagele, Jimoh		Email conveying legal advice to be sought from Van Der Heijden, Tomas* regarding update from internal legal counsel	AC
P00020	8/2/2017	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas Ovbiagele, Jimoh		Email chain with attachment(s) providing legal advice regarding Contract modification	AC
P00021	8/2/2017	Arruda, Andrew	Hamilton, Thomas  Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain providing legal advice regarding ROSS-LegalEase SOW	AC
P00022	8/2/2017	Ovbiagele, Jimoh	Arruda, Andrew	Hamilton, Thomas Van Der Heijden, Tomas*	Email chain forwarding & commenting upon legal advice provided by Van Der Heijden, Tomas* regarding LegalEase SOW	AC
P00023	8/3/2017	Hamilton, Thomas	Van Der Heijden, Tomas*	Arruda, Andrew	Email chain with attachment(s) seeking legal advice provided by regarding contract modifications	AC

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 2 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00024	8/9/2017	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas	Email chain seeking legal advice regarding LegalEase SOW	AC
P00025	8/9/2017	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas	Email chain seeking legal advice regarding LegalEase SOW	AC
P00026	8/9/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Arruda, Andrew Hamilton, Thomas	Email chain providing legal advice regarding ROSS-LegalEase SOW agreement	AC
P00027	8/22/2017	Conner, Ryan	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh Ross Intel	Email chain providing legal advice regarding ROSS financial disclosure	AC
P00028	8/23/2017	Conner, Ryan	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh Ross Intel	Email chain providing legal advice regarding contract terms	AC
P00029	8/23/2017	Van Der Heijden, Tomas*	Conner, Ryan	Arruda, Andrew Ovbiagele, Jimoh Ross Intel	Email chain seeking legal advice regarding ROSS financials	AC
P00030	9/7/2017	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email providing legal advice regarding LegalEase SOW Bulk Memo Project	AC
P00031	9/11/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Arruda, Andrew	Email chain providing legal advice regarding LegalEase SOW	AC
P00032	9/11/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh		Email prepared by counsel incorporating legal advice regarding LegalEase SOW	AC
P00033	9/13/2017	Asana	Van Der Heijden, Tomas*		Email to facilitate the rendition of legal advice to client regarding internal counsel legal tasks	AC
P00034	9/14/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding ROSS-LegalEase SOW agreement	AC
P00035	9/14/2017	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email with attachment(s) providing legal advice regarding draft contract	AC
P00036	9/15/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain with attachment(s) providing legal advice regarding contract drafting	AC
P00037	9/15/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain providing legal advice regarding LegalEase SOW	AC
P00038	9/15/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding ROSS-LegalEase SOW agreement	AC
P00039	9/15/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain with attachment(s) providing legal advice regarding ROSS- LegalEase SOW	AC
P00040	9/15/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding LegalEase SOW	AC
P00041	9/15/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding ROSS-LegalEase SOW agreement	AC
P00042	9/15/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain with attachment(s) providing legal advice regarding contract modifications	AC
P00043	9/15/2017	Van Der Heijden, Tomas*	Arruda, Andrew Lancaster, Peter*	Ovbiagele, Jimoh	Email chain providing legal advice regarding West v. LegalEase	AC
P00044	9/15/2017	Ovbiagele, Jimoh	Arruda, Andrew	Van Der Heijden, Tomas*	Email chain forwarding & commenting upon legal advice regarding LegalEase SOW draft	AC
P00045	9/15/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Arruda, Andrew	Email chain providing legal advice regarding ROSS-LegalEase SOW agreement	AC
P00046	9/15/2017	Ovbiagele, Jimoh	Arruda, Andrew	Van Der Heijden, Tomas*	Email chain providing legal advice regarding contract revisions	AC

### CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 3 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00047	9/18/2017	Asana	Van Der Heijden, Tomas*		Email to facilitate the rendition of legal advice to client regarding ROSS legal processes and status of matters	AC
P00048	9/21/2017	Asana	Van Der Heijden, Tomas*		Email prepared by counsel incorporating legal advice regarding internal counsel's task list	AC
P00049	9/25/2017	Asana	Van Der Heijden, Tomas*		Email reflecting legal advice regarding pending legal matters	AC
P00050	10/9/2017	Asana	Van Der Heijden, Tomas*		Email to facilitate the rendition of legal advice to client regarding ROSS legal matters	AC
P00051	11/3/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh		Email chain providing legal advice regarding ROSS-LegalEase Bulk Memo Project	AC
P00052	11/6/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding drafting a contract	AC
P00053	11/6/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh		Email chain providing legal advice regarding Bulk Memo project	AC
P00054	11/6/2017	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Arruda, Andrew	Email chain providing legal advice regarding LegalEase bulk memo agreement	AC
P00055	11/10/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain with attachment(s) providing legal advice regarding LegalEase-ROSS SOW	AC
P00056	11/10/2017	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Arruda, Andrew	Email chain to facilitate the rendition of legal advice to client to be sought from Van Der Heijden, Tomas* regarding Bulk Memo SOW	AC
P00057	11/10/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding Bulk Memo SOW	AC
P00058	11/11/2017	Arruda, Andrew	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Email chain with attachment(s) forwarding & commenting upon legal advice provided by Van Der Heijden, Tomas* regarding contract execution	AC
P00059	11/24/2017	Shafik, Sean	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding contract modifications	AC
P00060	11/24/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding Bulk Memo project	AC
P00061	11/25/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding ROSS-LegalEase SOW agreement	AC
P00062	11/25/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain with attachment(s) seeking legal advice regarding contract	AC
P00063	12/6/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Oubiagala limanh	modifications Email chain seeking legal advice regarding ROSS board minutes	AC
P00063	12/6/2017	Arruda, Aridrew	Vali Dei Heijden, Tomas	Ovbiagele, Jimoh	Email chain seeking legal advice regarding ROSS board minutes	AC
P00064	12/6/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding ROSS board minutes	AC
P00065	12/6/2017	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding preparation of ROSS Board minutes	AC
P00066	12/6/2017	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding preparation of ROSS Board minutes	AC
P00067	12/22/2017	Isakov, Maxim	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding ROSS Classifier project	AC
P00068	12/22/2017	Ovbiagele, Jimoh	Van Der Heijden, Tomas*		Email providing legal advice regarding drafting an agreement	AC
P00069	12/22/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh		Email chain providing legal advice regarding ROSS-LegalEase LPOs	AC
P00070	12/22/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh		Email with attachment(s) providing legal advice regarding drafting an agreement	AC

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 4 of 16

Priv No.	Date	From	То	CC Pri	rivilege Description	Privilege Type
P00071	12/22/2017	Van Der Heijden, Tomas*	Ovbiagele, Jimoh		nail with attachment(s) prepared by counsel incorporating legal advice garding licensing agreement	AC
P00072	1/1/2018	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Em	mail conveying legal advice regarding statement of work	AC
P00073	1/3/2018	DocuSign	Van Der Heijden, Tomas*		mail with attachment(s) reflecting legal advice regarding contract	AC
P00074	1/3/2018	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Em		AC
P00075	1/4/2018	Shafik, Sean	Van Der Heijden, Tomas*	Em		AC
P00076	1/10/2018	Shafik, Sean	Van Der Heijden, Tomas*	Em	nail chain seeking legal advice regarding LegalEase contracts	AC
P00077	1/10/2018	Van Der Heijden, Tomas*	Shafik, Sean		mail chain providing legal advice regarding external law sources	AC
P00078	2/2/2018	Shafik, Sean	Van Der Heijden, Tomas*	Em		AC
P00079	2/11/2018	Van Der Heijden, Tomas*	Shafik, Sean	Em	nail chain seeking legal advice sought from Van Der Heijden, Tomas* garding Payment for legal contracts	AC
P00080	2/11/2018	Shafik, Sean	Van Der Heijden, Tomas*	Em	nail chain seeking legal advice regarding legal contracts	AC
P00081	2/12/2018	Van Der Heijden, Tomas*	Shafik, Sean		nail chain providing legal advice regarding LegalEase and other ontractual matters	AC
P00082	2/27/2018	Shafik, Sean	Van Der Heijden, Tomas*			AC
P00083	2/27/2018	Van Der Heijden, Tomas*	Shafik, Sean	Em	nail chain providing legal advice regarding LegalEase memo payment	AC
P00084	4/9/2018	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Em	nail providing legal advice regarding LegalEase SOW	AC
P00085	4/10/2018	DocuSign	Van Der Heijden, Tomas*		nail to facilitate the rendition of legal advice to client to be sought from an Der Heijden, Tomas* regarding LegalEase SOW	AC
P00086	4/17/2018	DocuSign	Van Der Heijden, Tomas*		nail with attachment(s) forwarding & commenting upon legal advice garding contract negotiations	AC
P00087	4/17/2018	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Em	mail with attachment(s) providing legal advice regarding contract	AC
P00088	4/17/2018	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Em		AC
P00089	6/6/2018	Datesh, Annie	Van Der Heijden, Tomas*	Arruda, Andrew Em	mail chain to facilitate the rendition of legal advice to client to be ought from Datesh, Annie regarding LegalEase litigation	AC
P00090	6/6/2018	Arruda, Andrew	Hamilton, Thomas Van Der Heijden, Tomas*	Em	mail with attachment(s) seeking legal advice regarding West Publishing omplaint	AC
P00091	6/6/2018	Datesh, Annie	Van Der Heijden, Tomas*	Arruda, Andrew Em	nail chain with attachment(s) seeking legal advice regarding West v.	AC
P00092	6/6/2018	Van Der Heijden, Tomas*	Datesh, Annie	Arruda, Andrew Em		AC; WP
P00093	6/7/2018	Datesh, Annie	Van Der Heijden, Tomas*	Arruda, Andrew Em	nail chain providing legal advice regarding LegalEase litigation epared in anticipation of litigation	AC; WP
P00094	6/7/2018	Van Der Heijden, Tomas*	Datesh, Annie	Arruda, Andrew Em	nail chain seeking legal advice regarding West v. LegalEase prepared in nticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 5 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00095	6/8/2018	Datesh, Annie	Van Der Heijden, Tomas*	Ross Intel	in anticipation of litigation	
P00096	6/8/2018	Van Der Heijden, Tomas*	Datesh, Annie	Ross Intel	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	
P00097	6/8/2018	Van Der Heijden, Tomas*	Datesh, Annie Ross Intel		Email with attachment(s) seeking legal advice regarding review of contracts	AC
P00098	6/8/2018	Datesh, Annie	Van Der Heijden, Tomas*	Ross Intel	in anticipation of litigation	AC; WP
200099	6/8/2018	Datesh, Annie	Van Der Heijden, Tomas*	Arruda, Andrew Ross Intel	Email chain with attachment(s) seeking legal advice regarding West v. LegalEase	AC
P00100	6/8/2018	Datesh, Annie	Van Der Heijden, Tomas*	Ross Intel	Email chain providing legal advice regarding ROSS-LegalEase contracts and seeking of counsel relating to West v. LegalEase prepared in anticipation of litigation	AC; WP
200101	6/8/2018	Van Der Heijden, Tomas*	Datesh, Annie	Ross Intel	Email chain to facilitate the rendition of legal advice to client regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00102	6/8/2018	Datesh, Annie	Ross Intel Van Der Heilden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00103	6/8/2018	Van Der Heijden, Tomas*	Datesh, Annie		Email chain with attachment(s) seeking legal advice sought from Van Der Heijden. Tomas* regarding West v. LegalEase	AC
P00104	6/8/2018	Van Der Heijden, Tomas*	Datesh, Annie	Arruda, Andrew Ross Intel	Email seeking legal advice regarding West v. LegalEase	AC
P00105	6/9/2018	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Toppin, Graham	Email seeking legal advice regarding contract modifications	AC
P00106	6/10/2018	Van Der Heijden, Tomas*	Datesh, Annie	Ross Intel	Email with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00107	6/10/2018	Datesh, Annie	Van Der Heijden, Tomas*	Ross Intel Wawszczak, Mike	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00108	6/11/2018	Arruda, Andrew	Ovbiagele, Jimoh	Hamilton, Thomas Toppin, Graham Van Der Heijden, Tomas*	Email chain providing legal advice regarding West v. LegalEase	AC
P00109	6/11/2018	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas Toppin, Graham Von Simson, Chales	Email chain providing legal advice regarding West v. LegalEase	AC
P00110	6/11/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase	AC
P00111	6/11/2018	Van Der Heijden, Tomas*	Niederluecke, Kurt		Email chain seeking legal advice regarding West v. LegalEase	AC
P00112	6/11/2018	Van Der Heijden, Tomas*	Wawszczak, Mike	Datesh, Annie Ross Intel	Email chain conveying legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00113	6/11/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00114	6/11/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00115	6/11/2018	Van Der Heijden, Tomas*	Niederluecke, Kurt		Email chain seeking legal advice regarding West v. LegalEase	AC

### CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 6 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00116	6/11/2018	Van Der Heijden, Tomas*	Wawszczak, Mike	Datesh, Annie Ross Intel	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00117	6/11/2018	Hamilton, Thomas	Arruda, Andrew	Ovbiagele, Jimoh Toppin, Graham Van Der Heiiden, Tomas*	Email chain forwarding & commenting upon legal advice provided by Van Der Heijden, Tomas* regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00118	6/11/2018	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas Ovbiagele, Jimoh Toppin, Graham Von Simson, Charles*		Email providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00119	6/11/2018	Niederluecke, Kurt	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding West v. LegalEase	AC
P00120	6/11/2018	Datesh, Annie	Arruda, Andrew Van Der Heijden, Tomas*	Ross Intel	Email providing legal advice sought from Van Der Heijden, Tomas* regarding status of pending legal matters	AC
P00121	6/11/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00122	6/11/2018	Wawszczak, Mike	Datesh, Annie Van Der Heijden, Tomas*	Ross Intel	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00123	6/12/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email providing legal advice regarding West v. LegalEase	AC
P00124	6/12/2018	Datesh, Annie	Van Der Heijden, Tomas*	Ross Intel	Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00125	6/12/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase	AC
P00126	6/12/2018	Wawszczak, Mike	Van Der Heijden, Tomas*	Datesh, Annie Ross Intel	Email chain providing legal advice regarding LegalEase contracts and litigation prepared in anticipation of litigation	AC; WP
P00127	6/12/2018	Van Der Heijden, Tomas*	Datesh, Annie	Ross Intel	Email chain to facilitate the rendition of legal advice to client regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00128	6/14/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200129	6/14/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00130	6/14/2018	Lancaster, Peter*	Van Der Heijden, Tomas*			AC; WP
P00131	6/14/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00132	6/14/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00133	6/14/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00134	6/17/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00135	6/17/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00136	6/18/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 7 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00137	6/18/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00138	6/19/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00139	6/19/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00140	6/19/2018	Lancaster, Peter*	Van Der Heijden, Tomas*			AC; WP
P00141	6/19/2018	Van Der Heijden, Tomas*	Lancaster, Peter*	Bianchi-Rossi, Deanna	Email chain with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00142	6/19/2018	Lancaster, Peter*	Van Der Heijden, Tomas*	Bianchi-Rossi, Deanna	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200143	6/19/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00144	6/20/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00145	6/20/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00146	6/20/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00147	6/20/2018	Van Der Heijden, Tomas*	Lancaster, Peter*			AC; WP
P00148	6/20/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email with attachment(s) providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00149	6/25/2018	Lancaster, Peter*	Van Der Heijden, Tomas*	Bianchi-Rossi, Deanna	Email providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00150	6/25/2018	Van Der Heijden, Tomas*	Lancaster, Peter*	Bianchi-Rossi, Deanna	Email providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00151	6/25/2018	Lancaster, Peter*	Van Der Heijden, Tomas*	Bianchi-Rossi, Deanna	Email chain to facilitate the rendition of legal advice to client regarding West v. LegalEase	AC
P00152	6/26/2018	Van Der Heijden, Tomas*	Lancaster, Peter*	Bianchi-Rossi, Deanna	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00153	6/26/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain to facilitate the rendition of legal advice to client regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00154	6/26/2018	Bianchi-Rossi, Deanna	Van Der Heijden, Tomas*		Email chain to facilitate the rendition of legal advice to client regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00155	7/2/2018	Datesh, Annie	Arruda, Andrew Van Der Heijden, Tomas*	Ross Intel	Email providing legal advice regarding legal status update	AC
P00156	7/3/2018	Atruim Billing	Accounts Payable	Arruda, Andrew Atruim Billing Van Der Heijden, Tomas*	Email to facilitate the rendition of legal advice to client regarding issues list for ROSS-LegalEase agreement	AC
P00157	7/8/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	
P00158	7/9/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 8 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00159	7/13/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00160	7/14/2018	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	in anticipation of litigation	AC; WP
P00161	7/14/2018	Van Der Heijden, Tomas*	Arruda, Andrew Oybiagele, Jimoh		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00162	7/14/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00163	8/8/2018	Van Der Heijden, Tomas*	Accounts Payable		Email chain with attachment(s) to facilitate the rendition of legal advice to client regarding West v. LegalEase	AC
P00164	8/8/2018	Pong, Steven	Care Care Van Der Heijden, Tomas*		Email chain to facilitate the rendition of legal advice to client regarding Contract review	AC
P00165	8/14/2018	Van Der Heijden, Tomas*	Accounts Payable		Email chain to facilitate the rendition of legal advice to client regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00166	8/20/2018	Accounts Payable	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding West v. LegalEase	AC
P00167	9/5/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00168	9/5/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00169	9/10/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00170	9/18/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00171	9/19/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00172	9/20/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00173	9/20/2018	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00174	9/20/2018	Van Der Heijden, Tomas*	Von Simson, Charles*		Email chain providing legal advice provided by Van Der Heijden, Tomas* regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00175	9/20/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice provided by Lancaster, Peter* regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00176	9/20/2018	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00177	9/20/2018	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00178	9/20/2018	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00179	9/20/2018	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice provided by Van Der Heijden, Tomas* regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00180	9/20/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP

# CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 9 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00181	10/24/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00182		Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	
P00183	11/12/2018	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding West v. LegalEase	AC
P00184	11/14/2018	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00185	12/3/2018	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas Oybiagele, Jimoh		Email chain with attachment(s) forwarding & commenting upon legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00186	1/23/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding West v. LegalEase	AC
P00187	1/23/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase	AC
P00188	1/23/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00189		Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00190	1/24/2019	Van Der Heijden, Tomas*	Arruda, Andrew Hamilton, Thomas Oybiagele, Jimoh		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00191	1/28/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00192	1/28/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00193	1/28/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00194	1/28/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00195	1/28/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00196		Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	
P00197		Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00198	3/12/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00199	3/12/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	
P00200	3/12/2019	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00201	3/12/2019	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00202	3/12/2019	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 10 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00203	3/12/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain conveying legal advice regarding West v. Legalease litigation prepared in anticipation of litigation	AC; WP
P00204	3/12/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200205	3/12/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00206	3/13/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Arruda, Andrew Ovbiagele, Jimoh	Email chain seeking legal advice regarding West v. LegalEase litigation prepared in anticipation of litigation	AC; WP
00207	3/13/2019	Ovbiagele, Jimoh	Van Der Heijden, Tomas*	Arruda, Andrew	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00208	3/13/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Arruda, Andrew Ovbiagele, Jimoh	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00209	3/13/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00210	3/14/2019			Ovbiageie, simon	Email chain seeking legal advice regarding West litigation prepared in anticipation of litigation	AC; WP
00211	3/14/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00212	3/14/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00213	3/14/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00214	3/18/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00215	3/18/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00216	3/18/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00217	3/18/2019	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00218	3/18/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain reflecting legal advice regarding LegalEase protective order prepared in anticipation of litigation	AC; WP
00219	3/18/2019	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain with attachment(s) to facilitate the rendition of legal advice to client regarding West v. LegalEase	AC
00220	3/19/2019	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh		AC; WP
00221	3/22/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	George, Payton*	Email providing legal advice regarding West v. LegalEase	AC
00222	3/22/2019	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain with attachment(s) providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00223	3/22/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	George, Payton*	Email with attachment(s) seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00224	3/23/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	George, Payton*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00225	3/25/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200226	3/25/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 11 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00227	3/25/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	George, Payton*	Email with attachment(s) seeking legal advice regarding LegalEase	AC; WP
P00228	3/26/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00229	3/26/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00230	3/27/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00231	3/27/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	George, Payton*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	
00232	3/27/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	
00233	3/28/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00234	3/28/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00235	3/28/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00236	3/28/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase	AC
00237	3/28/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	George, Payton*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00238	3/28/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200239	3/28/2019	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200240	4/1/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	George, Payton*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200241	4/1/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00242	4/1/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	George, Payton*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200243	4/1/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200244	4/1/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding databases with tool applications prepared in anticipation of litigation	AC; WP
P00245	4/1/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00246	4/6/2019	Van Der Heijden, Tomas*	Shafik, Sean		Email chain providing legal advice regarding data costs	AC
00247	4/8/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	George, Payton*	Email providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00248	4/9/2019	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice regarding West Litigation prepared in anticipation of litigation	AC; WP
00249	4/9/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	George, Payton*	Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00250	4/9/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	George, Payton*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 12 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00251	4/9/2019	Van Der Heijden, Tomas*	Arruda, Andrew		Email chain providing legal advice regarding LegalEase litigation	AC; WP
			Ovbiagele, Jimoh		prepared in anticipation of litigation	
P00252	4/10/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared	AC; WP
					in anticipation of litigation	
P00253	4/10/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in	AC; WP
					anticipation of litigation	
P00254	4/10/2019	Lancaster, Peter*	Van Der Heijden, Tomas*			AC; WP
					prepared in anticipation of litigation	
P00255	4/11/2019	Lancaster, Peter*	Van Der Heijden, Tomas*			AC; WP
	1/11/0010		V 5 U U 7 *		prepared in anticipation of litigation	10 11/0
200256	4/11/2019	Lancaster, Peter*	Van Der Heijden, Tomas*			AC; WP
200057	4/44/0040	V 5 H "L T *			prepared in anticipation of litigation	A 0 . M/D
P00257	4/11/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared	AC; WP
200050	4 (05 (004 0	CL CL C	V 5 H "		in anticipation of litigation	A O . 14/D
P00258	4/25/2019	Shafik, Sean	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding LegalEase litigation prepared	AC; WP
200050	4 (05 (004 0	V D II "I T *	CI CI C		in anticipation of litigation	A O . 14/D
P00259	4/25/2019	Van Der Heijden, Tomas*	Shafik, Sean		Email chain with attachment(s) providing legal advice regarding legal	AC; WP
200270	4/25/2010	Van Dan Halldon Tanaart	Charilla Caran		fees prepared in anticipation of litigation  Email chain providing legal advice regarding fees and LegalEase litigation	A.C. JA/D
200260	4/25/2019	Van Der Heijden, Tomas*	Shafik, Sean			AC; WP
P00261	4/25/2019	Shafik, Sean	Van Der Heijden, Tomas*		prepared in anticipation of litigation  Email chain to facilitate the rendition of legal advice to client regarding	AC; WP
200261	4/25/2019	Snank, Sean	van Der Heijden, Tomas"			AC; WP
					West v. LegalEase prepared in anticipation of litigation	
P00262	4/26/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding LegalEase litigation prepared	AC; WP
					in anticipation of litigation	
P00263	4/26/2019	Van Der Heijden, Tomas*	Arruda, Andrew		Email chain providing legal advice regarding West v. LegalEase	AC
			Ovbiagele, Jimoh			
P00264	4/26/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared	AC; WP
					in anticipation of litigation	
P00265	4/26/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding West v. LegalEase prepared in	AC; WP
					anticipation of litigation	
P00266	4/26/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding West v. LegalEase prepared in	AC; WP
					anticipation of litigation	
200267	4/26/2019	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh	Email chain providing legal advice regarding West v. LegalEase prepared	AC; WP
					in anticipation of litigation	
200268	4/26/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding West v. LegalEase prepared in	AC; WP
					anticipation of litigation	
200269	4/26/2019	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh		AC; WP
					prepared in anticipation of litigation	
P00270	4/29/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared	AC; WP
					in anticipation of litigation	
P00271	4/29/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding West v. LegalEase prepared in	AC; WP
					anticipation of litigation	
P00272	4/29/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared	AC; WP
					in anticipation of litigation	
200273	4/29/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared	AC; WP
					in anticipation of litigation	

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 13 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00274	4/29/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00275	4/29/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00276	4/29/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00277	4/29/2019	Van Der Heijden, Tomas*	Lancaster, Peter*			AC; WP
200278	4/29/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00279	4/30/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00280	4/30/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200281	4/30/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00282	5/13/2019	Shafik, Sean	Van Der Heijden, Tomas*		Email chain to facilitate the rendition of legal advice to client to be sought from Lancaster, Peter* regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200283	5/13/2019	Van Der Heijden, Tomas*	Shafik, Sean		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200284	5/13/2019	Van Der Heijden, Tomas*	Shafik, Sean		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200285	5/15/2019	Van Der Heijden, Tomas*	Shafik, Sean		Email chain providing legal advice regarding West v. LegalEase	AC
P00286	5/15/2019	Van Der Heijden, Tomas*	Shafik, Sean		Email chain to facilitate the rendition of legal advice to client regarding West v. LegalEase	AC
P00287	5/15/2019	Shafik, Sean	Van Der Heijden, Tomas*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00288	6/15/2019	Van Der Heijden, Tomas*	Von Simson, Charles*		Email chain with attachment(s) providing legal advice regarding response to subpoena prepared in anticipation of litigation	AC; WP
P00289	6/17/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain with attachment(s) providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200290	6/20/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain reflecting legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00291	6/20/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00292	6/20/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200293	6/20/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	
200294	6/24/2019	Von Simson, Charles*	Lancaster, Peter*	Van Der Heijden, Tomas*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00295	6/24/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP

### CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 14 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00296	6/24/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00297	6/24/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00298	6/24/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00299	6/24/2019	Van Der Heijden, Tomas*	Von Simson, Charles*	Lancaster, Peter*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200300	6/24/2019	Lancaster, Peter*	Von Simson, Charles*	Van Der Heijden, Tomas*	Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200301	6/24/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200302	6/24/2019	Von Simson, Charles*	Lancaster, Peter*	Van Der Heijden, Tomas*	Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200303	6/25/2019	Van Der Heijden, Tomas*	Von Simson, Charles*	Lancaster, Peter*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00304	6/25/2019	Von Simson, Charles*	Lancaster, Peter*	Van Der Heijden, Tomas*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00305	6/25/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain with attachment(s) providing legal advice regarding response to ROSS subpoena prepared in anticipation of litigation	AC; WP
200306	6/25/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00307	6/26/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*		AC; WP
P00308	6/26/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Von Simson, Charles*	Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00309	6/26/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00310	6/26/2019	Van Der Heijden, Tomas*	Von Simson, Charles*	Lancaster, Peter*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00311	6/26/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00312	6/27/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*	Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200313	6/27/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00314	6/27/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Von Simson, Charles*	Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200315	6/27/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00316	6/27/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200317	6/27/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email with attachment(s) providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00318	6/27/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Von Simson, Charles*	Email reflecting legal advice regarding subpoena response prepared in anticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 15 of 16

Priv No.	Date	From	То	cc	Privilege Description	Privilege Type
P00319	6/27/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Von Simson, Chales	Email chain providing legal advice regarding West v. LegalEase	AC
P00320	7/11/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh Von Simson, Charles*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00321	7/11/2019	Von Simson, Charles*	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh	Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00322	7/11/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh Von Simson, Charles*		AC; WP
00323	7/11/2019	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200324	7/11/2019	Arruda, Andrew	Van Der Heijden, Tomas*	Ovbiagele, Jimoh	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
00325	7/11/2019	Van Der Heijden, Tomas*	Arruda, Andrew	Ovbiagele, Jimoh Von Simson, Charles*	Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00326	7/11/2019	Van Der Heijden, Tomas*	Arruda, Andrew Ovbiagele, Jimoh		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00327	7/11/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Johnson, Kate* Von Simson, Charles*	Email chain seeking legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00328	7/11/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Johnson, Kate*  Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200329	7/11/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Johnson, Kate*  Von Simson, Charles*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200330	7/11/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Johnson, Kate*	Email providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00331	7/15/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Johnson, Kate*	Email chain seeking legal advice regarding LegalEase litigation prepared lin anticipation of litigation	AC; WP
P00332	7/15/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00333	7/15/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00334	7/15/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Anastasiadis, Stergios Jarboe, Alexander Johnson, Kate* Von Simson, Charles*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00335	7/15/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Johnson, Kate* Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200336	7/15/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200337	7/15/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
00338	7/15/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Johnson, Kate*	Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
200339	7/15/2019	Van Der Heijden, Tomas*	Lancaster, Peter*		Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
200340	7/15/2019	Lancaster, Peter*	Van Der Heijden, Tomas*		Email chain providing legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00341	7/15/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Johnson, Kate* Von Simson, Charles*	Email chain providing legal advice regarding West v. LegalEase prepared in anticipation of litigation	AC; WP

## CASE 0:18-cv-01445-DSD-ECW Doc. 65-5 Filed 09/24/19 Page 16 of 16

Priv No.	Date	From	То	СС	Privilege Description	Privilege Type
P00342	7/15/2019	Van Der Heijden, Tomas*	Lancaster, Peter*	Johnson, Kate* Von Simson, Charles*	Email chain seeking legal advice regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00343	7/15/2019	Lancaster, Peter*	Van Der Heijden, Tomas*	Johnson, Kate*	Email providing legal advice regarding production to West prepared in anticipation of litigation	AC; WP
P00344	7/17/2019	Anastasiadis, Stergios	Johnson, Kate*	Jarboe, Alexander Lancaster, Peter*	Email chain reflecting information gathered or prepared at the direction of counsel regarding West v. LegalEase prepared in anticipation of litigation	AC; WP
P00345	7/17/2019	Johnson, Kate*	Anastasiadis, Stergios	Jarboe, Alexander Lancaster, Peter*	Email chain to facilitate the rendition of legal advice to client regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00346	7/17/2019	Johnson, Kate*	Anastasiadis, Stergios	Jarboe, Alexander Lancaster, Peter*	Email chain with attachment(s) reflecting information gathered or prepared at the direction of counsel regarding Subpoena Response prepared in anticipation of litigation	AC; WP
P00347	7/17/2019	Anastasiadis, Stergios	Johnson, Kate*	Jarboe, Alexander Lancaster, Peter*	Email chain to facilitate the rendition of legal advice to client regarding LegalEase litigation prepared in anticipation of litigation	AC; WP
P00348	7/17/2019	Dall'Oglio, Pargles	Van Der Heijden, Tomas*		Email seeking legal advice regarding LegalEase	AC